From CATHERINE SNYDER to Tom Connolly at Thu 7/12/2007 4:17 PM 2/4

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CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

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| CATHERINE SNYDER,<br>RICHARD SNYDER<br><br>Plaintiffs,<br><br>v.<br><br>GREENBERG, TRAURIG LLC *et al*<br><br>Defendants. | ) | Civil Action No.: 07CV469 |

MOTION WITH CONSENT FOR ENLARGEMENT OF TIME TO FILE
PLAINTIFF'S OPPOSITION
TO DEFENDANT'S MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7(i), Defendants Catherine and Richard Snyder hereby respectfully move for a two-week enlargement of time in which to complete Plaintiff's Motion in Oppostion of Defendants Motion to Dismiss. Defendant's Counsel do not oppose Plaintiff's motion.

In support of this motion, Catherine and Richard Snyder state as follows:

1. Defendants motioned the Court for a two week enlargement of time to file their initial response to Plaintiffs Complaint on the date their response was due to be filed with the court, June 11, 2007.

2. Defendants Greenberg, Traurig LLC did not retain counsel until three business days before their responsive pleading in this matter was to be filed with the court.

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3. Defendants Ms. Hajek, Mr. Wadyka and Mr. Lewin claim in their motion for an enlargement of time to file a responsive pleading in this matter that the individual. Defendants had still not been properly served. Contrary to this assertion, service was attempted by a professional process server on May 16, 2007 and individual defendants refused to accept service.

4. Said Process Server was told that service had to be made on Defendants Registered Agent, Company Services Corporation, which is located in Richmond Virginia.

5. Plaintiffs Catherine and Richard Snyder, had to incur the cost of hiring a process server located in Richmond Virginia, to serve summons on Defendants registered agents.

6. Plaintiff's are representing themselves *pro se* in the above civil action, Plaintiff's are not attorneys, nor do they possess any legal background.

7. Plaintiff's are making a sincere effort to educate themselves as to the Federal Civil Rules of Procedure, as well as the legal issues surrounding this case.

8. All legal research, required filings, clerical duties, etc. relating to Civil Case 1:07cv469, are primarily being done by Catherine Snyder.

9. Defendants filed their motion to dismiss on the same day their answer was due in court, June 11, 2007.

10. On June 25, 2007 Plaintiffs were notified that a hearing for Defendants motion to dismiss was set for Friday, July 27, 2007. On June 25, 2007 Defendants Counsel also notified Plaintiffs that any opposition to said motion to dismiss had to be filed within 20 days. Per Defendants Counsel's notification, the date set for Plaintiffs opposition

to Defendant's motion to dismiss is set for July 15, 2007.

11. This motion is not made for purposes of improperly delaying this action, and the granting of this motion would not unfairly benefit to the movements or prejudice at the defendants.

For the forgoing reasons, Catherine and Richard Snyder respectfully request a two-week enlargement of time to file their opposition to defendant's motion to dismiss.

Dated: July 9, 2007

Respectfully submitted,

Catherine and Richard Snyder
603 Nash Street.
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703-707-8130.
Defendants in *pro se*

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